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UNITED STATES DISTRICT COURT

IGT, a Nevada corporation

Plaintiff,

v.

SCRAPPY ELEGANT GAMING, LLC, a revoked Nevada limited liability company; DARRYL ROSENBLATT, a Nevada resident; JAMIE LEIGH KLINGLER, a Nevada resident; and DOES 1-10 inclusive.

Defendants.

2:17-cv-02532-RFB-GWF

STIPULATION TO EXTEND TIME TO FILE RESPONSIVE PLEADING

(First Request)

Defendants recently contacted this Court's chambers with a request to extend the pending deadline to file a responsive pleading from January 23, 2018 to February 6, 2018. A true and correct copy of Defendants' request to this Court's chambers is attached hereto as **Exhibit A**. This 1

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is Defendants' first request for stipulation of an extension of time to file a responsive pleading following completion of substitute service pursuant to this Court's December 7, 2017 Order. See ECF Nos. 39-41.

Plaintiff IGT does not oppose Defendants' request.

Dated: January 22, 2018.

McDONALD CARANO LLP

By: <u>/s/ Craig A. Newby</u> Jeffrey A. Silvestri (NSBN 5779) Craig A. Newby (NSBN 8591) Amanda M. Perach (NSBN 12399) 2300 West Sahara Avenue, Suite 1200 Las Vegas, Nevada 89102 Telephone: (702) 873-4100 Facsimile: (702) 873-9966 jsilvestri@mcdonaldcarano.com cnewby@mcdonaldcarano.com aperach@mcdonaldcarano.com

John M. Desmarais (pro hac vice application submitted) Justin P.D. Wilcox (pro hac vice application submitted) Jonas R. McDavit (pro hac vice application submitted) Kathryn Bi (pro hac vice to be submitted) **DESMARAIS LLP** 230 Park Avenue New York, NY 10169 Telephone: (212) 351-3400 jdesmarais@desmaraisllp.com jwilcox@desmaraisllp.com jmcdavit@desmaraisllp.com kbi@desmaraisllp.com

Attorneys for Plaintiff IGT

IT IS SO ORDERED:

DATED: January 23, 2018

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of McDonald Carano LLP, and that on the 22nd day of January, 2018, a true and correct copy of the foregoing STIPULATION TO **EXTEND TIME TO FILE RESPONSIVE PLEADING** was electronically filed with the Clerk of the Court by using CM/ECF service which will provide copies to all counsel of record registered to receive CM/ECF notification and via regular U.S. Mail to the parties listed below:

Darryl Rosenblatt 8665 Tindall Road Davisburg, MI 48350

Jamie Leigh Klingler 8665 Tindall Road Davisburg, MI 48350

Scrappy Elegant Gaming, LLC 8665 Tindall Road Davisburg, MI 48350

/s/ Brian Grubb

An Employee of McDonald Carano LLP

4843-0454-1018, v. 1

Exhibit A Defendants' Motion for Extension of Time to File Responsive Pleadings

Exhibit A
Defendants' Motion for Extension of
Time to File Responsive Pleadings

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

IGT, A Nevada Corporation,

Case No. 2:17-cv-02532

Plaintiff,

-VS-

SCRAPPY ELEGANT GAMING, LLC, A Revoked Nevada LLC, DARRYL ROSENBLATT, A Nevada Resident, JAMIE LEIGH KLINGLER, A Nevada Resident and DOES 1-10, Inclusive,

Defendants.

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Amanda M. Perach (NSBN 12399)
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DEFENDANTS, SCRAPPY ELEGANT GAMING, LLC, DARRYL ROSENBLATT AND JAMIE LEIGH KLINGER'S MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADINGS

Defendants, Scrappy Elegant Gaming, LLC, Darryl Rosenblatt and Jamie Leigh Klinger ("Defendants"), appearing pro se, request an extension of time to answer or otherwise respond to the Complaint filed by IGT. understanding that the answer to IGT's Complaint is currently due on January 23, 2018. Defendants respectfully request a fourteen (14) day extension of time to respond to the Complaint in order to resolve the case with IGT, or in the alternative, obtain counsel to represent us. The Complaint raises several claims including claims of alleged non-infringement of U.S. Patent No. 9,582,970 (the '970 patent) and alleged invalidity of the '970 patent. We are not patent attorneys and need the assistance of a qualified patent attorney to assist with these highly technical and legally challenging allegations. We are in the process of interviewing legal counsel and determining the best counsel to hire. Since the allegations challenge the validity of the '970 patent, it is important to have qualified counsel involved to protect the validity of this valuable property. We also need additional time to marshal the evidence and respond to the allegations made by IGT. Please let us know if you need any additional information in order to grant our request for an extension of time.

We have entered into conversations with Plaintiff's counsel, and based upon these productive conversations, believe that this matter will be resolved within the next 14 days.

Should the parties not reach an amiable resolution by that time, Defendants are prepared to retain counsel.

Darryl Rosenblatt can be reached by telephone at 248 762. We respectfully request a fourteen (14) day extension because of the complexity of the issues and the nature of the case.

Respectfully Submitted,

Dated: 1/20/2018 SCRAPRY FLEGANT GAMING, LLC

SCRAPPY ELEGANT GAMING, LLC

By: _____Jamie Klingler

Its: CEO

Dated: 1/20/2018

DARRYL ROSENBLATT, In Pro Se

Dated: 1/20/2018

JAMIE LEIGH KLINGLER, In Pro Se

CERTIFICATE OF SERVICE

I hereby certify that on Monday, the 22nd day of January, 2018, a copy of the foregoing document was emailed to Blanca E. Lenzi, Courtroom administrator to the Honorable Richard F. Boulware. Notice of this filing will be sent to the Plaintiff through electronic mail. Defendant's request this request be made a part of the case record.

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